

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

MEMORANDUM

DATE: March 4, 2022

AMENDED

DATE: March 22, 2022

SUBJECT: Efficacy Review for Multi Purpose Plus Disinfectant Cleaner (Primary - Liquid

Dilutable),

EPA Reg. No. 1677-272 Action Code Case: 00321749 E-submission No. 67584

Efficacy Review for Multi Purpose Plus Disinfectant Cleaner RTU (Secondary)

Micole Karikari

alp

EPA Reg. No. 1677-273 Action Code Case: 00321748 E-submission No. 67585

FROM: Nicole Karikari

Efficacy Branch

Antimicrobials Division (7510P) Date Signed: March 22, 2022

THRU: Sophie Nguyen

Efficacy Branch

Antimicrobials Division (7510P) Date Signed: March 3, 2022

TO: Marcel Howard, Acting PM 34/ Heather Garvie

Regulatory Management Branch II Antimicrobials Division (7510P)

APPLICANT: Ecolab, Inc.

1 Ecolab Place St. Paul, MN 55102

Formulations from the Label:

Efficacy Review for Multi Purpose Plus Disinfectant Cleaner (Primary - Liquid Di	lutable)
Active Ingredient(s)	% by wt.
Dodecylbenzenesulfonic Acid	10.0%
Other Ingredients	90.0%
Total	100.0%
Efficacy Review for Multi Purpose Plus Disinfectant Cleaner RTU (Secondary)	
Active Ingredient(s)	<u>% by wt.</u>
Dodecylbenzenesulfonic Acid	0.47%
Other Ingredients	99.53%
Total	100.00%

I. BACKGROUND

Product Description (as packaged, as applied): Concentrated Liquid (Dilutable)

Submission type: Label Amendment

Currently registered efficacy claim(s): Nonfood contact sanitizer, disinfectant (bactericide and virucide) for use on hard, nonporous and soft surface sanitizer (with electrostatic spray application).

Requested action(s): Applicant is submitting efficacy data to support label amendments for EPA Reg. No. 1677-272 (Primary – concentrate) and 1677-273 (Secondary – RTU) to reduce contact times disinfection (bactericidal, virucidal, and electrostatic sprayer) claims; add soft surface disinfection claims; and add a 30-day use solution stability claim.

Documents considered in this review:

Efficacy Review for Multi Purpose Plus Disinfectant Cleaner (Primary – Liquid Dilutable)

- Cover letter from applicant to EPA dated 8/11/2021
- Proposed label dated 8/18/2021
- Data Matrix (EPA Form 8570-35) dated 8/27/2021
- Twenty-one efficacy studies
 - o MRID 51618801
 - o MRID 51618802
 - o MRID 51618803
 - o MRID 51618804
 - MRID 51618805
 - o MRID 51618806
 - o MRID 51618807
 - o MRID 51618808
 - o MRID 51618809
 - o MRID 51618810
 - o MRID 51618811
 - o MRID 51618812
 - o MRID 51618813

- o MRID 51618814
- o MRID 51618815
- o MRID 51618816
- MRID 51618817
- o MRID 51618818
- o MRID 51618819
- o MRID 51618820
- o MRID 51618821
- One Long Term Storage Stability study
 - o MRID 51618822
- Confidential Statement of Formula (EPA Form 8670-4)
 - Basic Formulation dated 3/31/2021

Efficacy Review for Multi Purpose Plus Disinfectant Cleaner RTU (Secondary)

- Cover letter from applicant to EPA dated 8/11/2021
- Proposed label dated 7/16/2021
- Data Matrix (EPA Form 8570-35) dated 8/17/2021
- Citing twenty-one efficacy studies from EPA Reg. No. 1677-272 (MRIDs 51618801 through 51618821)
- Confidential Statement of Formula (EPA Form 8670-4)
 - Basic Formulation dated 3/31/2021

II. PROPOSED DIRECTIONS FOR USE

Efficacy Review for Multi Purpose Plus Disinfectant Cleaner (Primary – Liquid Dilutable)

"[For] [1-Step] [One-Step] [Cleaning and] Sanitizing [for] Hard, Non-Porous, Non-Food Contact Surfaces †:

-or-

To [Clean and] Sanitize Hard, Non-Porous, Non-Food Contact Surfaces† [in 1 Step] [In One Step] [in the presence of 5% organic soil load]:

Dilute [this product] [insert product name] [through a closed loop dispenser] 4 -6 fl. oz./gal in [tap] [hard] [up to 400 ppm hard] water. Visibly soiled surfaces must be pre-cleaned [with this product] prior to sanitizing. To [clean and] sanitize, apply [this product] [insert product name] to the [hard, non-porous] surface [by] [pouring], [squirting], [or] with a [cloth,] [disposable wipe,] [sponge], [brush,] [scrubber,] [mop,] [trigger] sprayer [device] or by immersion, wetting the surface. For spray application, spray 6-8 inches from the surface. [Rub [wet surface] with clean brush, sponge or cloth]. Allow surface to remain wet for 3 minutes. Allow to air dry or remove solution with a wipe, mop, cloth, sponge, squeegee, or vacuum pickup. [No [water] rinse required]. [A water rinse is not required].

Non-Food Contact Surface Sanitizing

Application: Soak or Spray

Use Concentration: 4 – 6 fl. oz/gal

BacteriaATCC StrainContact TimeStaphylococcus aureusATCC 65383 min[utes]Klebsiella aerogenesATCC 130483 min[utes]

[For] [1-Step] [One-Step] [Spot] [Cleaning and] Sanitizing [and Deodorizing] [for] Soft Surfaces‡: -or-

To [Clean] [Deodorize] [and] Sanitize Soft Surfaces‡ [In 1 Step] [In One Step] [in the presence of 5% organic soil load]:

Dilute [this product] [insert product name] [through a closed loop dispenser] to 4.25 - 6 fl. oz./gal in [tap] [hard] [up to 400 ppm hard] water. Spot treat by spraying 6-8 inches from the surface until fabric is wet. Allow surface to remain wet for 5 minutes. Allow [fabric] [soft surface] to air dry, or remove solution with a wipe, mop, cloth, sponge, squeegee, or vacuum pickup. Visibly soiled areas must be cleaned prior to sanitizing. [Not recommended for use on white or light-colored fabric.] Spot-test in an inconspicuous location before application.

Soft Surface Sanitizing – Natural and Synthetic Fabric Application: Spray

Use Concentration: 4.25 - 6 fl. oz/gal

BacteriaATCC StrainContact TimeStaphylococcus aureusATCC 65385 min[utes]Klebsiella aerogenesATCC 130485 min[utes]

TO [CLEAN AND] DISINFECT AND FOR USE AS A VIRUCIDE ON HARD, NON-POROUS NON-FOOD CONTACT SURFACES [IN 1-STEP] [IN ONE-STEP] (using spray applications):

Dilute [this product] [insert product name] to 4-6 fl. oz./gal in [tap] [hard] [up to 400 ppm hard] water. Apply [this product] [insert product name] to surface by [hand pump] [coarse] [trigger][pressurized] [sprayer] (6-8 inches from surface) to wet the surface. Allow surface to remain wet for the contact time indicated in the table below. Air dry or remove solution with a wipe, mop, cloth, sponge, squeegee, or vacuum pickup. (No (water) rinse required on non-food contact surfaces). Visibly soiled areas must be cleaned prior to disinfection. Do not use on glassware, dishes, or silverware.

Hard Non-Porous Surface Disinfection [by Spray Application] Application: Spray

Use Concentration: 4 – 6 fl. oz/gal

Bacteria	ATCC Strain	Contact Time
Staphylococcus aureus	ATCC 6538	5 min[utes]
Pseudomonas aeruginosa	ATCC 15442	5 min[utes]
Salmonella enterica	ATCC 6539	3 min[utes]
subspecies enterica serovar		
Typhi		
Proteus mirabilis	ATCC 7002	3 min[utes]
Bordetella bronchiseptica	ATCC 10580	5 min[utes]
Bordetella pertussis	ATCC12743	5 min[utes]
Klebsiella pneumoniae	ATCC 4352	5 min[utes]
Klebsiella aerogenes	ATCC 13048	5 min[utes]
Serratia marcescens	ATCC 14756	5 min[utes]
Shigella dysenteriae	ATCC 29026	5 min[utes]
Enterococcus faecalis	ATCC 51299	5 min[utes]
[Vancomycin		
resistant [VRE]]		
Klebsiella pneumoniae	ATCC BAA-1705	5 min[utes]
[Carbapenemase producer		
or Carbapenem-resistant]		
[KPC]		
Staphylococcus aureus [MRSA]	ATCC 33592	5 min[utes]
Staphylococcus aureus [CA-	ATCC BAA-1683	5 min[utes]
MRSA]		
USA-400		
Escherichia coli 0157:H7	ATCC 43895	5 min[utes]
Listeria monocytogenes	ATCC 7644	5 min[utes]
Streptococcus pyogenes	ATCC 19615	5 min[utes]
· · ·		

Viruses* *Influenza A [H1N1] *Norovirus [Feline Calicivirus	ATCC Strain ATCC VR-1469 ATCC VR-782	Contact Time 30 sec[onds] 30 sec[onds]
Surrogate] [FCV] [Norwalk] *Rhinovirus Type 37 *SARS-CoV-2 virus [*SARS-Related Coronavirus 2]	ATCC VR-1607 USA-WA 1/2020	30 sec[onds] 10 sec[onds]
*Adenovirus Type 5 *Canine distemper *Canine parvovirus, Strain Cornell-780916-80	ATCC VR-5 ATCC VR-128 ATCC VR-2017	30 sec[onds] 30 sec[onds] 30 sec[onds]
*Hepatitis B Virus [Duck Hepatitis B as surrogate]		30 sec[onds]
*Hepatitis C Virus [Bovine Viral Diarrhea] [HCV]	ATCC VR-1422	30 sec[onds]
*Herpes Simplex Type I [Herpes]	ATCC VR-733	30 sec[onds]
*Human Immunodeficiency Viru Strain HTLV IIIB	s type 1 [HIV-1]	30 sec[onds]
*Human Coronavirus, Strain 229E	ATCC VR-740	30 sec[onds]
*Influenza A [H3N2] *Influenza B *Murine Norovirus	ATCC VR-544 ATCC VR-1535	30 sec[onds] 30 sec[onds] 2 min[utes]
*Poliovirus Type 1 [Chat Strani, Strain Brunhilde]	ATCC CCL-81	30 sec[onds]
*Respiratory Syncytial Virus [RSV]	ATCC VR-26	30 sec[onds]
*Rotavirus [Strain WA] *Vaccinia Virus [Pox Virus]	ATCC VR-2018 ATCC VR-119	30 sec[onds] 30 sec[onds]
*Measles *Feline panleukopenia	ATCC VR-24 ATCC VR-648	30 sec[onds] 30 sec[onds]
*Herpes Simplex Type II [Herpes]	ATCC VR-734	30 sec[onds]

Hard, Non-Porous Surface Disinfection [by Spray Application] Application: Spray

Use Concentration: 6 fl. oz/gal

BacteriaATCC StrainContact TimeStaphylococcus aureusATCC 65383 min[utes]Pseudomonas aeruginosaATCC 154423 min[utes]Viruses*ATCC StrainContact Time*Murine Norovirus30 sec[onds]

TO [CLEAN AND] DISINFECT AND FOR USE AS A VIRUCIDE ON HARD, NON-POROUS NON-FOOD CONTACT SURFACES (using soak applications):

Dilute [this product] [insert product name] to 6 fl. oz./gal in [tap] [hard] [up to 400 ppm hard] water. Surfaces must be pre-cleaned [with] [this product] [or] [a suitable cleaner] prior to disinfecting. To disinfect, apply [this product] [insert product name] to the surface [by] [pouring], [squirting], [or] [with a] [cloth,] [disposable wipe,] [sponge,] [brush,] [scrubber,] [mop,] or sprayer [device], wetting the surface. Allow surface to remain wet for the contact time indicated in the table below. Allow to air dry or remove solution with a wipe, mop, cloth, sponge, squeegee, or vacuum pickup. (No (water) rinse required on nonfood contact surfaces). Visibly soiled areas must be cleaned prior to disinfection.

Hard, Non-Porous Surface Disinfection

Application: Soak or spray Use Concentration: 6 fl. oz/gal

Bacteria ATCC Strain **Contact Time** Staphylococcus aureus ATCC 6538 10 min[utes]** Pseudomonas aeruginosa ATCC 15442 10 min[utes]** Viruses* **ATCC Strain Contact Time** *Influenza A [H1N1] ATCC VR-1469 30 sec[onds] ATCC VR-782 *Norovirus [Feline Calicivirus 30 sec[onds] Surrogate] [FCV] [Norwalk] ATCC VR-1607 *Rhinovirus Type 37 30 sec[onds] *SARS-CoV-2 virus USA-WA 1/2020 30 sec[onds] [*SARS-Related Coronavirus

2]

FOR USE AS A [ONE-STEP] SOFT SURFACE DISINFECTANT AND VIRUCIDE ON SOFT SURFACES:

Apply [this product] [insert product name] by [hand pump] [coarse] [trigger][pressurized] sprayer [6-8 inches from surface] to wet the surface. Allow surface to remain wet for the contact time indicated in the table below. Allow fabric to air dry, or remove solution with a wipe, mop, cloth, sponge, squeegee, or vacuum. [Reapply as necessary]. Visibly soiled areas must be cleaned prior to disinfecting. Effective on natural and synthetic surfaces such as rayon, polyester, and cotton. Not recommended for use on nylon [or for use on white [or light colored] soft surfaces]. Spot-test in an inconspicuous location before application. Effective in the presence of 5% fetal bovine serum against the following:

Soft Surface Disinfection

Application: Spray

BacteriaATCC StrainContact TimeStaphylococcus aureusATCC 653810 min[utes]Pseudomonas aeruginosaATCC 1544210 min[utes]Viruses*ATCC StrainContact TimeHuman Adenovirus Type 5ATCC VR-510 min[utes]

GENERAL DIRECTIONS FOR USE WITH ELECTROSTATIC SPRAYING

Remove by-standers and pets from the area to be treated. Do not use for treatment of humans, air, or for fumigation. Spray droplet particle size should set to a limit volume median diameter of ≥40µm. Use N95 filtering facepiece respirators or half face respirators with N95 filters. Plan the spray routine to minimize unnecessary exposure to treated areas [for example, begin applying product in the back of the room/area and work towards the front of the room/area]. Place the electrostatic spray function in the ON position for electrostatic spray models that have the functionality to toggle ON/OFF.

FOR USE A [MULTI SURFACE] [ONE-STEP] CLEANER, DISINFECTANT, AND VIRUCIDE BY ELECTROSTATIC SPRAYING

To disinfect hard, non-porous surfaces, dilute 4 - 6 fl. oz./gal. For visibly soiled areas, pre-cleaning is required. Apply use solution with electrostatic sprayer to hard, non-porous environmental surfaces. Spray approximately 6 to 12 inches from the surfaces; making sure to wet surfaces thoroughly. All surfaces must remain wet for the required contact time indicated in the hard surface disinfection table, reapplying if necessary. Wipe or let air dry. When using on food contact surfaces, thoroughly rinse all treated surfaces with potable water."

Efficacy Review for Multi Purpose Plus Disinfectant Cleaner RTU (Secondary)

"[For] [1-Step] [One-Step] [Cleaning and] Sanitizing [for] Hard, Non-Porous, Non-Food Contact Surfaces†:

-or-

To [Clean and] Sanitize Hard, Non-Porous, Non-Food Contact Surfaces† [in 1 Step] [in One Step] [in the presence of 5% organic soil load]:

To [clean and] sanitize, apply [this product] [insert product name] to the [hard, non-porous] surface [by] [pouring], [squirting], [or] [with a] [cloth,] [disposable wipe,] [sponge,] [brush,] [scrubber,] [mop,] [trigger] [electrostatic] sprayer [device] [or by immersion], wetting the surface. For spray application, spray 6-8 inches from the surface. [Rub [wet surface] with clean brush, sponge or cloth]. Allow surface to remain wet for 3 minutes. Allow to air dry or remove solution with a wipe, mop, cloth, sponge, squeegee, or vacuum pickup. [No [water] rinse required]. [A water rinse is not required]. Visibly soiled surfaces [must] [should] be pre-cleaned [with this product] prior to sanitizing.

Non-Food Contact Surface Sanitizing

Application: Soak or Spray

Bacteria	ATCC Strain	Contact Time
Staphylococcus aureus	ATCC 6538	3 min[utes]
Klebsiella aerogenes	ATCC 13048	3 min[utes]

[For] [1-Step] [One-Step] [Spot] [Cleaning and] Sanitizing [and Deodorizing] [for] Soft Surfaces‡: -or-

To [Clean] [Deodorize] [and] Sanitize Soft Surfaces‡ [In 1 Step] [In One Step] [in the presence of 5% organic soil load]:

Spot treat by spraying 6-8 inches from the surface until fabric is wet. Allow surface to remain wet for 5 minutes. Allow [fabric] [soft surface] to air dry, or remove solution with a wipe, mop, cloth, sponge, squeegee, or vacuum pickup. Visibly soiled areas must be cleaned prior to sanitizing. [Not recommended for use on white or light-colored fabric.] Spot-test in an inconspicuous location before application.

Soft Surface Sanitizing – Natural and Synthetic Fabric Application: SprayBacteriaATCC StrainContact TimeStaphylococcus aureusATCC 65385 min[utes]Klebsiella aerogenesATCC 130485 min[utes]

TO [CLEAN AND] DISINFECT AND FOR USE AS A VIRUCIDE ON HARD, NON-POROUS NON-FOOD CONTACT SURFACES [IN 1-STEP] [IN ONE-STEP] (using spray applications):

Apply [this product] [insert product name] to surface by [hand pump] [coarse] [trigger][pressurized] [sprayer] [6-8 inches from surface] to wet the surface. Allow surface to remain wet for the contact time indicated in the table below. Air dry or remove solution with a wipe, mop, cloth, sponge, squeegee, or vacuum pickup. (No (water) rinse required on non-food contact surfaces). Visibly soiled areas must be cleaned prior to disinfection. Do not use on glassware, dishes, or silverware.

Hard, Non-Porous Surface Disinfection [by Spray Application] Application: Spray

Bacteria	ATCC Strain	Contact Time
Staphylococcus aureus	ATCC 6538	3 min[utes]
Pseudomonas aeruginosa	ATCC 15442	3 min[utes]
Salmonella enterica	ATCC 6539	3 min[utes]
subspecies enterica serovar		
Typhi		
Proteus mirabilis	ATCC 7002	3 min[utes]
Bordetella bronchiseptica	ATCC 10580	3 min[utes]
Bordetella pertussis	ATCC12743	3 min[utes]
Klebsiella pneumoniae	ATCC 4352	5 min[utes]
Klebsiella aerogenes	ATCC 13048	5 min[utes]

Serratia marcescens Shigella dysenteriae Enterococcus faecalis [Vancomycin resistant [VRE]]	ATCC 14756 ATCC 29026 ATCC 51299	5 min[utes] 5 min[utes] 5 min[utes]
Klebsiella pneumoniae [Carbapenemase producer or Carbapenem-resistant] [KPC]	ATCC BAA-1705	5 min[utes]
Staphylococcus aureus [MRSA] Staphylococcus aureus [CA- MRSA] USA-400	ATCC 33592 ATCC BAA-1683	5 min[utes] 5 min[utes]
Escherichia coli 0157:H7	ATCC 43895	5 min[utes]
Listeria monocytogenes	ATCC 7644	5 min[utes]
Streptococcus pyogenes	ATCC 19615	5 min[utes]
Viruses*	ATCC Strain	Contact Time
*Influenza A [H1N1]	ATCC VR-1469	30 sec[onds]
*Norovirus [Feline Calicivirus	ATCC VR-782	30 sec[onds]
Surrogate] [FCV] [Norwalk]		
*Rhinovirus Type 37	ATCC VR-1607	30 sec[onds]
*SARS-CoV-2 virus	USA-WA 1/2020	10 sec[onds]
[*SARS-Related Coronavirus 2]		
*Adenovirus Type 5	ATCC VR-5	30 sec[onds]
*Canine distemper	ATCC VR-128	30 sec[onds]
*Canine parvovirus, Strain	ATCC VR-2017	30 sec[onds]
Cornell-780916-80		
*Hepatitis B Virus		30 sec[onds]
[Duck Hepatitis B as surrogate]		
*Hepatitis C Virus [Bovine Viral Diarrhea] [HCV]	ATCC VR-1422	30 sec[onds]
*Herpes Simplex Type I [Herpes]	ATCC VR-733	30 sec[onds]
*Human Immunodeficiency Virus Strain HTLV IIIB	type 1 [HIV-1]	30 sec[onds]
*Human Coronavirus, Strain 229E	ATCC VR-740	30 sec[onds]
*Influenza A [H3N2]	ATCC VR-544	30 sec[onds]
*Influenza B	ATCC VR-1535	30 sec[onds]
*Murine Norovirus		30 sec[onds]
*Poliovirus Type 1 [Chat Strain, Strain Brunhilde]	ATCC VR-1562	30 sec[onds]
*Respiratory Syncytial Virus [RSV]	ATCC VR-26	30 sec[onds]
*Rotavirus [Strain WA]	ATCC VR-2018	30 sec[onds]
*Vaccinia Virus [Pox Virus]	ATCC VR-119	30 sec[onds]
*Measles	ATCC VR-24	30 sec[onds]
*Feline panleukopenia	ATCC VR-648	30 sec[onds]
*Herpes Simplex Type II [Herpes]	ATCC VR-734	30 sec[onds]

TO [CLEAN AND] DISINFECT AND FOR USE AS A VIRUCIDE ON HARD, NON-POROUS NON-FOOD CONTACT SURFACES (using soak applications):

Surfaces must be pre-cleaned [with] [this product] [or] [a suitable cleaner] prior to disinfecting. To disinfect, apply [this product] [insert product name] to the surface [by] [pouring], [squirting], [or] [with a]

[cloth,] [disposable wipe,] [sponge,] [brush,] [scrubber,] [mop,] or sprayer [device], wetting the surface. Allow surface to remain wet for the contact time indicated in the table below. Allow to air dry or remove solution with a wipe, mop, cloth, sponge, squeegee, or vacuum pickup. (No (water) rinse required on non-food contact surfaces).

Hard, Non-Porous Surface Disinfection

Application: Soak or spray

The same area and say		
Bacteria	ATCC Strain	Contact Time
Staphylococcus aureus	ATCC 6538	10 min[utes]**
Pseudomonas aeruginosa	ATCC 15442	10 min[utes]**
Viruses*	ATCC Strain	Contact Time
*Influenza A [H1N1]]	ATCC VR-1469	30 sec[onds]
*Norovirus [Feline Calicivirus	ATCC VR-782	30 sec[onds]
Surrogate] [FCV] [Norwalk]		
*Rhinovirus Type 37 [common	ATCC VR-1607	30 sec[onds]
cold]		
*SARS-CoV-2 virus	USA-WA 1/2020	30 sec[onds]
[*SARS-Related Coronavirus		
21		

^{**} A 10-minute contact time is not applicable for electrostatic sprayers; a 3-minute contact time must be used.

FOR USE AS A [ONE-STEP] SOFT SURFACE DISINFECTANT AND VIRUCIDE ON SOFT SURFACES:

Apply [this product] [insert product name] by [hand pump] [coarse] [trigger][pressurized] sprayer [6-8 inches from surface] to wet the surface. Allow surface to remain wet for the contact time indicated in the table below. Allow fabric to air dry, or remove solution with a wipe, mop, cloth, sponge, squeegee, or vacuum. [Reapply as necessary]. Visibly soiled areas must be cleaned prior to disinfecting. Effective on natural and synthetic surfaces such as rayon, polyester, and cotton. Not recommended for use on nylon [or for use on white [or light colored] soft surfaces]. Spot-test in an inconspicuous location before application. Effective in the presence of 5% fetal bovine serum against the following:

Soft Surface Disinfection

Application: Spray

Bacteria	ATCC Strain	Contact Time
Staphylococcus aureus	ATCC 6538	10 min[utes]
Pseudomonas aeruginosa	ATCC 15442	10 min[utes]
Viruses*	ATCC Strain	Contact Time
Human Adenovirus Type 5	ATCC VR-5	10 min[utes]

FOR USE AS A [TWO-STEP] SOFT SURFACE DISINFECTANT AND VIRUCIDE ON SOFT SURFACES:

Pre-clean fabric surface. Apply [this product] [insert product name] by [hand pump] [coarse] [trigger][pressurized] sprayer [6-8 inches from surface] to wet the surface. Allow surface to remain wet for the contact time indicated in the table below. Allow fabric to air dry, or remove solution with a wipe, mop, cloth, sponge, squeegee, or vacuum. [Reapply as necessary]. Effective on natural and synthetic surfaces such as rayon, polyester, and cotton. Not recommended for use on nylon [or for use on white [or light colored] soft surfaces]. Spot-test in an inconspicuous location before application. Effective against the following:

Soft Surface Disinfection

Application: Spray

Bacteria ATCC Strain Contact Time

Staphylococcus aureus
Pseudomonas aeruginosa
Viruses*
*Norovirus [Feline Calicivirus
Surrogate] [FCV] [Norwalk]
Human Adenovirus Type 5

ATCC 6538 ATCC 15442 ATCC Strain ATCC VR-782

10 min[utes] 10 min[utes] **Contact Time** 5 min[utes]

ATCC VR-5 10 min[utes]

GENERAL DIRECTIONS FOR USE WITH ELECTROSTATIC SPRAYING

Remove by-standers and pets from the area to be treated. Do not use for treatment of humans, air, or for fumigation. Spray droplet particle size should be set to a limit median diameter of ≥40µm. Use N95 filtering facepiece respirators or half face respirators with N95 filters. Plan the spray routine to minimize unnecessary exposure to treated areas [for example, begin applying product in the back of the room/area and work towards the front of the room/area]. Place the electrostatic spray function in the ON position for electrostatic spray models that have the functionality to toggle ON/OFF.

FOR USE AS A [MULTI SURFACE] [ONE-STEP] CLEANER, DISINFECTANT, AND VIRUCIDE BY ELECTROSTATIC SPRAYING

To disinfect hard, non-porous surfaces, apply use solution with electrostatic sprayer. Spray approximately 6 to 12 inches from the surfaces; making sure to wet surfaces thoroughly. All surfaces must remain wet for the required contact time indicated in the hard surface disinfection table, reapplying if necessary. Wipe or let air dry. For visibly soiled areas, pre-cleaning is required. When using on food contact surfaces, thoroughly rinse all treated surfaces with potable water."

III. STUDY SUMMARIES

1.	MRID	51618801	
Study Object	ive	Disinfectant - Vir	ucidal
Testing Lab;	Lab Study ID	Analytical Lab G	oup – Midwest; A31331
Experimental	Start Date	12/2/2020	Study Completion Date: 1/8/2021
Test organism	n(s)	Bovine Viral Diar	rhea Virus (BVDV) (ATCC VR-1422) as a
□ 1 □ 2 □ 3	□ 4+	surrogate for Hur	nan Hepatitis C Virus
Indicator Cell	Culture	Bovine Turbinate	(BT) cells (ATCC CRL-1390)
Test Method		ASTM E1053-11	; Protocol Number: ECO01091720.BVD
Application M	lethod		e sprayed using 4 sprays, until
			t a distance of 6 to 8 inches, and held
		covered for the e	xposure time."
Test	Name/ID	920209	
Substance	Lots	5439EG2200 (Quaternary Active: 9.9%)	
Preparation	□1⊠2□3	5439EG2400 (Quaternary Active: 9.9%)	
	Preparation	Tested concentration: LCL	
		Tested Dilution: 4 oz./ 1 gallon defined as 8.93 g +/- 0.03	
		g test substance + 291.07 g +/- 0.03 g of diluent	
		Diluent: 400 ppm AOAC Synthetic Hard Water	
Soil load		5% horse serum	
Carrier type,	# per lot	100 x 15 mm sterile glass Petri dish, 2 per lot	
Test conditio	Test conditions Contact time: 30 seconds		seconds
		Temperature: 21.0°C	
		Relative humidity: 16.63%	
Neutralizer		Sephadex LH-20 gel column	
Reviewer con	nments	Protocol Amendment:	

amendments, retesting,	"This protocol is amended to add Health Canada to the study acceptance criteria, in section "a" of the protocol modifications attachment, for clarity."
	No Protocol Deviations were reported.

2.	MRID	51618802	
Study Objecti	ive	Disinfectant - Virucidal	
Testing Lab;	Lab Study ID	Analytical Lab Group – Midwest; A31426	
Experimental	Start Date	12/3/2020 Study Completion Date: 1/26/2021	
Test organism	n(s)	Respiratory Syncytial Virus (RSV), Strain Long (ATCC	
☑ 1 □ 2 □ 3 □	□ 4+	VR-26)	
Indicator Cell	Culture	Hep-2 (human larynx carcinoma) cells (ATCC CCL-23)	
Test Method		ASTM E1053-20; Protocol Number: ECO01091720.RSV	
Application N	lethod	"The carriers were sprayed using 4 sprays, until thoroughly wet, at a distance of 6 to 8 inches, and held	
		covered for the exposure time."	
Test	Name/ID	920209	
Substance	Lots	5439EG2200 (Quaternary Active: 9.9%)	
Preparation	□1⊠2□3	5439EG2400 (Quaternary Active: 9.9%)	
	Preparation	Tested concentration: LCL	
	-	Tested Dilution: 4 oz./ 1 gallon defined as 8.93 g +/- 0.03	
		g test substance + 291.07 g +/- 0.03 g of diluent	
		Diluent: 400 ppm AOAC Synthetic Hard Water	
Soil load		5% Fetal Bovine Serum	
Carrier type,		100 x 15 mm sterile glass Petri dish, 1 per lot	
Test conditio	ns	Contact time: 30 seconds	
		Temperature: 21.0°C	
	Relative humidity: 19.57%		
Neutralizer		Sephadex LH-20 gel column	
	Reviewer comments No Protocol Amendments or Protocol Deviations were		
•		reported.	
amendments, control failures	•		

3.	MRID	51618803	
Study Objecti	ive	Disinfectant - Vir	ucidal
Testing Lab;	Lab Study ID	Analytical Lab G	oup – Midwest; A31320
Experimental	Start Date	12/1/2020	Study Completion Date: 1/6/2021
Test organism	n(s)	Canine Distemper Virus, Strain Lederle (ATCC VR-128)	
⊠ 1 □ 2 □ 3	□ 4+		
Indicator Cell	Culture	Vero cells (ATCC CCL-81)	
Test Method		ASTM E1053-11; Protocol Number: ECO01091720.CDIS	
Application M	lethod	"The carriers were sprayed using 4 sprays, until	
		thoroughly wet, at a distance of 6 to 8 inches, and held	
		covered for the exposure time."	
	Name/ID	920209	

Test Substance	Lots □ 1 ⊠ 2 □ 3	5439EG2200 (Quaternary Active: 9.9%) 5439EG2400 (Quaternary Active: 9.9%)	
Preparation	Preparation	Tested concentration: LCL Tested Dilution: 4 oz./ 1 gallon defined as 8.93 g +/- 0.03 g test substance + 291.07 g +/- 0.03 g of diluent Diluent: 400 ppm AOAC Synthetic Hard Water	
Soil load		5% Fetal Bovine Serum	
Carrier type,	# per lot	100 x 15 mm sterile glass Petri dish, 1 per lot	
Test conditions		Contact time: 30 seconds Temperature: 21.5°C Relative humidity: 16.08%	
Neutralizer		Sephadex LH-20 gel column	
Reviewer comments (i.e. protocol deviations and amendments, retesting, control failures, etc.)		No Protocol Amendments or Protocol Deviations were reported.	

4.	MRID	51618804		
Study Objective		Disinfectant - Virucidal		
Testing Lab;	Testing Lab; Lab Study ID		oup – Midwest; A31477	
Experimental	Start Date	12/3/2020	Study Completion Date: 1/20/2021	
Test organism	n(s)	Canine Parvoviru	s, Strain Cornell-780916-80 (ATCC VR-	
⊠ 1 □ 2 □ 3	□ 4+	2017)		
Indicator Cell	Culture	A-72 (Canine Tur	nor) Cells (ATCC CRL-1542)	
Test Method		ASTM E1053-11;	Protocol Number: ECO01091720.CPV	
Application M	lethod		e sprayed using 4 sprays, until	
			t a distance of 6 to 8 inches, and held	
		covered for the ex	xposure time."	
Test	Name/ID	920209		
Substance	Lots	5439EG2200 (Quaternary Active: 9.9%)		
Preparation	□1⊠2□3	5439EG2400 (Quaternary Active: 9.9%)		
	Preparation	Tested concentra	tion: LCL	
		Tested Dilution: 4	oz./ 1 gallon defined as 8.93 g +/- 0.03	
		g test substance	+ 291.07 g +/- 0.03 g of diluent	
		Diluent: 400 ppm AOAC Synthetic Hard Water		
Soil load		5% Fetal Bovine Serum		
Carrier type,		100 x 15 mm sterile glass Petri dish, 1 per lot		
Test condition	ns	Contact time: 30		
		Temperature: 22.0°C		
		Relative humidity: 20.91%		
Neutralizer		Sephadex LH-20 gel column		
Reviewer comments			ndments or Protocol Deviations were	
(i.e. protocol deviations and		reported.		
amendments, retesting,				
control failures	s, etc.)			

5. MRID	51618805	
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Study Objective		Disinfectant - Virucidal	
Testing Lab; Lab Study ID		Analytical Lab Group – Midwest; A31366	
Experimental	Experimental Start Date		Study Completion Date: 5/5/2021
Test organism	n(s)	Human Coronav	irus, Strain 229E (ATCC VR-740)
☑ 1 □ 2 □ 3	□ 4+		
Indicator Cell	Culture	WI-38 (human lu	ng) cells (ATCC VR-740)
Test Method		ASTM E1053-20	; Protocol Number: ECO01091720.COR
Application M	lethod	"The carriers we	re sprayed using 4 sprays, until
			at a distance of 6 to 8 inches, and held
		covered for the e	exposure time."
Test	Name/ID	920209	
Substance	Lots	5439EG2200 (Q	uaternary Active: 9.9%)
Preparation	□1⊠2□3	5439EG2400 (Q	uaternary Active: 9.9%)
	Preparation	Tested concentration: LCL Tested Dilution: 4 oz./ 1 gallon defined as 8.93 g +/- 0.0	
		g test substance	+ 291.07 g +/- 0.03 g of diluent
			AOAC Synthetic Hard Water
Soil load		5% Fetal Bovine Serum	
Carrier type,	# per lot	100 x 15 mm ste	rile glass Petri dish, 1 per lot
Test conditio	ns	Contact time: 30	seconds
		Temperature: 22.0°C	
		Relative humidity: 25.75%	
Neutralizer		Sephadex LH-20 gel column	
Reviewer comments		No Protocol Ame	endments or Protocol Deviations were
(i.e. protocol deviations and		reported.	
amendments, retesting,			
control failures	s, etc.)		

6.	MRID	51618806	
Study Objective		Disinfectant - Vir	ucidal
Testing Lab;	Lab Study ID	Analytical Lab G	oup – Midwest; A31328
Experimental	Start Date	12/1/2020	Study Completion Date: 1/18/2021
Test organism	n(s)	Feline Panleukop	penia virus, Strain Philips-Roxane (ATCC
□ 1 □ 2 □ 3	□ 4+	VR-648)	
Indicator Cell	Culture	CRFK (feline kidi	ney) cells (ATCC CCL-994)
Test Method		ASTM E1053-20	Protocol Number: ECO01091720.FPLV
Application M	lethod	"The carriers were sprayed using 4 sprays, until	
			t a distance of 6 to 8 inches, and held
- ,	N //D	covered for the e	xposure ume.
Test	Name/ID	920209	
Substance	Lots	5439EG2200 (Quaternary Active: 9.9%)	
Preparation	Preparation ☐ 1 ⊠ 2 ☐ 3		uaternary Active: 9.9%)
Preparation		Tested concentra	ition: LCL
		Tested Dilution: 4 oz./ 1 gallon defined as 8.93 g +/- 0.03	
		g test substance + 291.07 g +/- 0.03 g of diluent	
		Diluent: 400 ppm	AOAC Synthetic Hard Water
Soil load		5% Fetal Bovine Serum	

Carrier type, # per lot	100 x 15 mm sterile glass Petri dish, 1 per lot
Test conditions	Contact time: 30 seconds
	Temperature: 21.0°C
	Relative humidity: 13.97%
Neutralizer	Sephadex LH-20 gel column
Reviewer comments	No Protocol Amendments or Protocol Deviations were
(i.e. protocol deviations and	reported.
amendments, retesting,	
control failures, etc.)	

7.	MRID	51618807			
Study Objective		Disinfectant - Virucidal			
Testing Lab;	Lab Study ID	Analytical Lab Group – Midwest; A31349			
Experimental	Start Date	11/23/2020 Study Completion Date: 1/6/2021			
Test organism	n(s)	Poliovirus type 1, Strain Chat (ATCC VR-1562)			
□ 1 □ 2 □ 3	□ 4+				
Indicator Cell	Culture	Vero cells (ATCC CCL-81)			
Test Method		ASTM E1053-20; Protocol Number: ECO01091720.POL			
Application M	lethod	"The carriers were sprayed using 4 sprays, until			
		thoroughly wet, at a distance of 6 to 8 inches, and held			
	T	covered for the exposure time."			
Test	Name/ID	920209			
Substance	Lots	5439EG2200 (Quaternary Active: 9.9%)			
Preparation	□1⊠2□3	5439EG2400 (Quaternary Active: 9.9%)			
	Preparation	Tested concentration: LCL			
	-	Tested Dilution: 4 oz./ 1 gallon defined as 8.93 g +/- 0.03			
		g test substance + 291.07 g +/- 0.03 g of diluent			
		Diluent: 400 ppm AOAC Synthetic Hard Water			
Soil load		5% Fetal Bovine Serum			
Carrier type,		100 x 15 mm sterile glass Petri dish, 1 per lot			
Test conditio	ns	Contact time: 30 seconds			
		Temperature: 22.0°C			
		Relative humidity: 18.10%			
Neutralizer		Sephadex LH-20 gel column			
Reviewer comments		No Protocol Amendments or Protocol Deviations were			
(i.e. protocol deviations and		reported.			
amendments, retesting,					
control failures, etc.)					

8.	MRID	51618808	
Study Objecti	ve	Disinfectant - Virucidal	
Testing Lab; Lab Study ID		Analytical Lab Group – Midwest; A31291	
Experimental Start Date		11/23/2020	Study Completion Date: 4/20/2021
Test organism(s)		Vaccinia virus, S	train WR (ATCC VR-119)
☑ 1 □ 2 □ 3 □ 4+			
Indicator Cell Culture		Vero cells (ATCC	CCL-81)
Test Method		ASTM E1053-20	Protocol Number: ECO01091720.VAC

Application Method		"The carriers were sprayed using 4 sprays, until thoroughly wet, at a distance of 6 to 8 inches, and held covered for the exposure time."
Test	Name/ID	920209
Substance Preparation	Lots □ 1 ⊠ 2 □ 3	5439EG2200 (Quaternary Active: 9.9%) 5439EG2400 (Quaternary Active: 9.9%)
	Preparation	Tested concentration: LCL Tested Dilution: 4 oz./ 1 gallon defined as 8.93 g +/- 0.03 g test substance + 291.07 g +/- 0.03 g of diluent Diluent: 400 ppm AOAC Synthetic Hard Water
Soil load		5% Fetal Bovine Serum
Carrier type, # per lot		100 x 15 mm sterile glass Petri dish, 1 per lot
Test conditions		Contact time: 30 seconds Temperature: 22.0°C Relative humidity: 16.09%
Neutralizer		Sephadex LH-20 gel column
Reviewer comments (i.e. protocol deviations and amendments, retesting, control failures, etc.)		No Protocol Amendments or Protocol Deviations were reported.

9.	MRID	51618809	51618809		
Study Objective		Disinfectant - Virucidal			
Testing Lab; Lab Study ID					
	_		oup – Midwest; A31318	4/0/0004	
Experimental		11/24/2020	Study Completion Date:		
Test organism		Human Rotavirus	s, Strain WA (ATCC VR-20	118)	
⊠ 1 □ 2 □ 3	□ 4+				
Indicator Cell	Culture	MA-104 (Rhesus 2378.1)	monkey kidney) cells (AT	CC CRL-	
Test Method			Protocol Number: ECO01		
Application M	lethod	"The carriers wer	e sprayed using 4 sprays,	until	
			t a distance of 6 to 8 inche		
		covered for the e	xposure time."		
Test	Name/ID	920209			
Substance	Lots	5439EG2200 (Qu	uaternary Active: 9.9%)		
Preparation	□1⊠2□3	5439EG2400 (Quaternary Active: 9.9%)			
	Preparation	Tested concentra	tion: LCL		
	•	Tested Dilution: 4	oz./ 1 gallon defined as 8	.93 q +/- 0.03	
			+ 291.07 g +/- 0.03 g of di		
		Diluent: 400 ppm AOAC Synthetic Hard Water			
Soil load	l	5% Fetal Bovine Serum			
Carrier type, # per lot		100 x 15 mm sterile glass Petri dish, 1 per lot			
Test conditions		Contact time: 30 seconds			
		Temperature: 21.0°C			
		Relative humidity: 28.59%			
Neutralizer		Sephadex LH-20 gel column			

Reviewer comments	No Protocol Amendments or Protocol Deviations were
(i.e. protocol deviations and	reported.
amendments, retesting,	
control failures, etc.)	

10.	MRID	51618810		
Study Objective		Disinfectant - Virucidal		
Testing Lab; Lab Study ID		Analytical Lab Group – Midwest; A31473		
Experimental	Start Date	2/15/2021 Study Completion Date : 6/8/2021		
Test organism	n(s)	Duck Hepatitis B virus as a surrogate for Human Hepatitis		
⊠ 1 □ 2 □ 3	□ 4+	B virus, Source: Hepadnavirus Testing Inc., Palo Alto, CA		
Indicator Cell	Culture	Purified hepatocytes from two-day old Pekin breed		
		hatchling ducks, Source: Metzer Farms by Valley		
		Research Institute (VRI)		
Test Method		ASTM E1053-20; Protocol Number: ECO01091720.ROT		
Application N	lethod	"The carriers were sprayed using 4 sprays, until		
		thoroughly wet, at a distance of 6 to 8 inches, and held		
	1	covered for the exposure time."		
Test	Name/ID	920209		
Substance	Lots	5439EG2200 (Quaternary Active: 9.9%)		
Preparation	□1⊠2□3	5439EG2400 (Quaternary Active: 9.9%)		
	Preparation	Tested concentration: LCL		
		Tested Dilution: 4 oz./ 1 gallon defined as 8.93 g +/- 0.03		
		g test substance + 291.07 g +/- 0.03 g of diluent		
		Diluent: 400 ppm AOAC Synthetic Hard Water		
Soil load		5% Fetal Bovine Serum		
Carrier type,		100 x 15 mm sterile glass Petri dish, 1 per lot		
Test conditio	ns	Contact time: 30 seconds		
		Temperature: 22.0°C		
		Relative humidity: 5.49%		
Neutralizer		Sephadex LH-20 gel column		
Reviewer comments		No Protocol Amendments or Protocol Deviations were		
(i.e. protocol deviations and		reported.		
amendments, retesting,				
control failures, etc.)				

11.	MRID	51618811	
Study Objective		Disinfectant - Vir	rucidal
Testing Lab; Lab Study ID		Analytical Lab G	Group – Midwest; A32029
Experimental Start Date		2/5/2021	Study Completion Date: 2/24/2021
Test organism(s)		Human Immuno	deficiency Virus type 1, Strain HTLV-III _B
⊠ 1 □ 2 □ 3 □ 4+		obtained from Ad	dvanced Biotechnologies, Inc. Columbia,
		MD	
Indicator Cell Culture		MT-2 (human T-	-cell leukemia) cells
Test Method		ASTM E1053-20	0; Protocol Number: ECO01092520.HIV

Application Method		"The carriers were sprayed using 4 sprays, until thoroughly wet, at a distance of 6 to 8 inches, and held covered for the exposure time."
Test Name/ID		920209
Substance Preparation	Lots □ 1 ⊠ 2 □ 3	5439EG2200 (Quaternary Active: 9.9%) 5439EG2400 (Quaternary Active: 9.9%)
	Preparation	Tested concentration: LCL Tested Dilution: 4 oz./ 1 gallon defined as 8.93 g +/- 0.03 g test substance + 291.07 g +/- 0.03 g of diluent Diluent: 400 ppm AOAC Synthetic Hard Water
Soil load		5% Fetal Bovine Serum
Carrier type, # per lot		100 x 15 mm sterile glass Petri dish, 1 per lot
Test conditions		Contact time: 30 seconds Temperature: 21.43°C Relative humidity: 6.46%
Neutralizer		Sephadex LH-20 gel column
Reviewer comments (i.e. protocol deviations and amendments, retesting, control failures, etc.)		No Protocol Amendments or Protocol Deviations were reported.

12.	MRID	51618812			
Study Objective		Disinfectant - Virucidal			
Testing Lab; Lab Study ID		Analytical Lab G	oup – Midwest; A31446		
Experimental	Start Date	12/2/2020	Study Completion Date: 1/29/2021		
Test organism	n(s)	SARS-Related C	oronavirus 2, Strain Isolate USA-		
⊠ 1 □ 2 □ 3	□ 4+	WA1/2020 (Sour	ce: BEI Resources NR-52281)		
Indicator Cell	Culture	Vero E6 cells (A7	CC CRL-1586)		
Test Method		ASTM E1053-20	; Protocol Number:		
		ECO01092920.S	ARS2.3		
Application M	lethod	"The carriers wer	e sprayed using 4 sprays, until		
			t a distance of 6 to 8 inches, and held		
		covered for the e	xposure time."		
Test	Name/ID	920209			
Substance	Lots	5439EG2200 (Q	uaternary Active: 9.9%)		
Preparation	□1□2⊠3	5439EG2400 (Quaternary Active: 9.9%)			
		5439EG2600 (Q	uaternary Active: 10.0%)		
	Preparation	Tested concentration: LCL			
		Tested Dilution: 4	4 oz./ 1 gallon defined as 8.93 g +/- 0.03		
		g test substance	+ 291.07 g +/- 0.03 g of diluent		
		Diluent: 400 ppm AOAC Synthetic Hard Water			
Soil load		5% Fetal Bovine Serum			
Carrier type,	# per lot	100 x 15 mm sterile glass Petri dish, 1 per lot			
Test conditions		Contact time: 10 seconds			
		Temperature: 18.85°C			
		Relative humidity: 17.82%			
Neutralizer		Sephadex LH-20	gel column		

Reviewer comments	No Protocol Amendments or Protocol Deviations were
(i.e. protocol deviations and	reported.
amendments, retesting,	
control failures, etc.)	

12.	MRID	51618812	
Study Objective		Disinfectant - Virucidal	
Testing Lab; Lab Study ID		Analytical Lab Group – Midwest; A31446	
Experimental	Start Date	12/2/2020 Study Completion Date : 1/29/2021	
Test organism	n(s)	SARS-Related Coronavirus 2, Strain Isolate USA-	
⊠ 1 □ 2 □ 3	□ 4+	WA1/2020 (Source: BEI Resources NR-52281)	
Indicator Cell	Culture	Vero E6 cells (ATCC CRL-1586)	
Test Method		ASTM E1053-20; Protocol Number:	
		ECO01092920.SARS2.3	
Application M	lethod	"The carriers were sprayed using 4 sprays, until	
		thoroughly wet, at a distance of 6 to 8 inches, and held	
	T	covered for the exposure time."	
Test	Name/ID	920209	
Substance	Lots	5439EG2200 (Quaternary Active: 9.9%)	
Preparation	□1□2⊠3	5439EG2400 (Quaternary Active: 9.9%)	
		5439EG2600 (Quaternary Active: 10.0%)	
	Preparation	Tested concentration: LCL	
		Tested Dilution: 4 oz./ 1 gallon defined as 2.97 g +/- 0.03	
		g test substance + 97.03 g +/- 0.03 g of diluent	
		Diluent: 400 ppm AOAC Synthetic Hard Water	
Soil load		5% Fetal Bovine Serum	
Carrier type,		100 x 15 mm sterile glass Petri dish, 1 per lot	
Test conditio	ns	Contact time: 10 seconds	
		Temperature: 18.85°C	
		Relative humidity: 17.82%	
Neutralizer		Sephadex LH-20 gel column	
Reviewer comments		No Protocol Amendments or Protocol Deviations were	
(i.e. protocol deviations and		reported.	
amendments, retesting,			
control failures, etc.)			

13.	MRID	51618813	
Study Object	ive	Disinfectant - Ba	ctericidal
Testing Lab;	Lab Study ID	Analytical Lab G	roup – Midwest; A31536
Experimental	Start Date	12/9/2020	Study Completion Date: 12/16/2020
Test organism	n(s)	Bordetella bronc	hiseptica (ATCC 10580)
☑ 1 □ 2 □ 3 □ 4+			
Test Method		ASTM E1053-20	; Protocol Number: ECO01100720.GS.1
Application Method			re sprayed using 4 sprays, until at a distance of 6 to 8 inches, and held exposure time."
	Name/ID	920209	

Test	Lots	5439EG2200 (Quaternary Active: 9.9%)	
Substance	□1⊠2□3	5439EG2400 (Quaternary Active: 9.9%)	
Preparation Preparation		Tested concentration: LCL	
		Tested Dilution: 4 oz./ 1 gallon defined as 8.93 g +/- 0.03	
		g test substance + 291.07 g +/- 0.03 g of diluent	
		Diluent: 400 ppm AOAC Synthetic Hard Water	
Soil load		5% Fetal Bovine Serum	
Carrier type,	# per lot	Glass slides (18 mm x 36 mm), 10 per lot	
Test conditio	ns	Contact time: 3 minutes	
		Temperature: 19°C	
		Relative humidity: 7%	
Neutralizer		Letheen Broth + 0.14% Lecithin + 1.0% Tween 80 + 0.1%	
		Sodium Thiosulfate	
Reviewer comments		Protocol Amendment: Page 10 of the protocol was	
(i.e. protocol deviations and		amended to clarify that a supplemental information form	
amendments, retesting,		was attached.	
control failures, etc.)			
		No Protocol Deviations were reported.	

14.	MRID	51618814		
Study Objective		Disinfectant - Bactericidal		
Testing Lab; Lab Study ID		Analytical Lab Group – Midwest; A31535		
Experimental	Start Date	12/14/2020 Study Completion Date : 5/17/2021		
Test organism	n(s)	Bordetella pertussis (ATCC 12743)		
⊠ 1 □ 2 □ 3	□ 4+			
Test Method		AOAC 961.02; Protocol Number: ECO01100720.GS.2		
Application M	lethod	"The carriers were sprayed using 4 sprays, until		
		thoroughly wet, at a distance of 6 to 8 inches, and held		
		covered for the exposure time."		
Test	Name/ID	920209		
Substance	Lots	5439EG2200 (Quaternary Active: 9.9%)		
Preparation	□1⊠2□3	5439EG2400 (Quaternary Active: 9.9%)		
	Preparation	Tested concentration: LCL		
	-	Tested Dilution: 4 oz./ 1 gallon defined as 8.93 g +/- 0.03		
		g test substance + 291.07 g +/- 0.03 g of diluent		
		Diluent: 400 ppm AOAC Synthetic Hard Water		
Soil load		5% Fetal Bovine Serum		
Carrier type,		Glass slides (18 mm x 36 mm), 10 per lot		
Test conditio	ns	Contact time: 3 minutes		
		Temperature: 20°C		
		Relative humidity: 24%		
Neutralizer		Letheen Broth + 0.14% Lecithin + 1.0% Tween 80 + 0.1%		
		Sodium Thiosulfate		
Reviewer comments		No Protocol Amendments were reported.		
(i.e. protocol deviations and		Drate and Davieties as		
amendments, retesting,		Protocol Deviations:		
control failures, etc.)		"The protocol specified that the 2-line spray setting should		
		be used on the sprayer for the test. In testing on		

December 14, 2020, and January 15, 2021, this was not recorded in the raw data. Although the spray setting could not be verified, the test substance demonstrated passing efficacy. Therefore, this deviation has no impact on the overall intent of the protocol."

"The protocol attachment requested measurement of spray weights. In testing on December 14, 2020, and January 15, 2021, the technicians did not record the total number of sprays used to complete the measurement of spray weights, the technicians recorded the number of sprays for the test in the raw data as specified by the protocol. The protocol attachments says, "spray the dish for the specified time or for the required number of trigger sprays at the specified distance." The protocol specifies 4 sprays at a distance of 6-8 inches. Therefore, because the technicians followed the protocol in testing, and this spray weight measurement does not affect the efficacy results of the test substance, this deviation had no impact on the overall intent of the protocol."

"Unforeseen Circumstances

The protocol states that the acceptance criteria for the carrier population control is 4.0-5.0 Log10. In testing on December 14, 2020, the carrier population control was < 3.50 Log10, which was below the upper limit and therefore did not meet the acceptance criteria. It was determined that the protocol was followed and performed correctly as all other controls met acceptance criteria. This data is invalid and presented in Attachment I."

"Therefore the test was repeated on January 15, 2021 with no organism dilution. This data is valid and presented in the body of this report."

15.	MRID	51618815		
Study Objective		Disinfectant - Virucidal		
Testing Lab;	Lab Study ID	Bioscience Labo	ratories, Inc.; 2010738-404	
Experimental	Start Date	2/1/2020	Study Completion Date: 3/16/2021	
Test organism	n(s)	Measles virus, st	rain Edmonston (ATCC VR-24)	
⊠ 1 □ 2 □ 3	□ 4+			
Indicator Cell	Culture	Vero cells (ATCC CCL-81)		
Test Method		ASTM E1053-20; Protocol Number: 2010738-404		
Application Method		spraying four tim the 2-line spray s	estion was applied to each carrier by es from a distance of 6 to 8 inches using setting on the sprayer. Sufficient test applied to ensure that the carrier was d."	
	Name/ID 920209			

Test	Lots	5439EG2200 (Quaternary Active: 9.9%)
Substance		5439EG2400 (Quaternary Active: 9.9%)
Preparation	Preparation	Tested concentration: LCL
		Tested Dilution: 4 oz./ 1 gallon defined as 8.93 g +/- 0.03
		g test substance + 291.07 g +/- 0.03 g of diluent
		Diluent: 400 ppm AOAC Synthetic Hard Water
Soil load		5% Heat Inactivated Fetal Bovine Serum
Carrier type,		100 x 15 mm sterile glass Petri dish, 1 per lot
Test condition	ns	Contact time: 30 seconds
		Temperature: 22.5 to 22.7°C
		Relative humidity: 15.32 to 17.40%
Neutralizer		Dey-Engley (D/E) Broth
Reviewer con		Protocol Amendments:
(i.e. protocol d		"Two amendments were made in the course of this
amendments,		evaluation.
control failures	s, etc.)	The Direct and #00040700 404 was about and to connect a
		The Protocol #20010738-404 was changed to correct a typographical error.
		typograpriicai error.
		The Canadian guidance document, Guidance document – Safety and efficacy requirements for hard surface disinfectant drugs (January, 2014) was replaced with Health Canada Guidance document – Safety and efficacy requirement for hard surface disinfectant drugs (2020)."
		Protocol Deviations: "One deviation to the Study Protocol occurred during this evaluation.
		Section 23.3.7 of the protocol states, "The plates will be incubated for 5 to 14 days at 37°C ± 2°C in a CO2 incubator." On 12/08/2020 the plates were removed from the incubator after a 19 day incubation. The plates needed a longer incubation for sufficient cytopathic effect of the virus to occur. There was no adverse effect on the study. All acceptance criteria were met."

16.	MRID	51618816	
Study Object	ive	Disinfectant - Vir	ucidal
Testing Lab;	Lab Study ID	Ecolab; 2100005	
Experimental	Start Date	2/10/2021	Study Completion Date: 5/18/2021
Test organism(s)		Human Herpes S	Simplex Virus Type 1, Strain F (ATCC VR-
☑ 1 □ 2 □ 3 □ 4+		733)	
Indicator Cell Culture		Vero cells (Source	ce: Quidel (Diagnostic Hybrids)
Test Method		ASTM E1053-20	; Protocol Number: MS505 Version 5.0
Application Method		"Spray: Application	on of 4 sprays from a distance of about 6-
		8 inches (visually	v estimated)"
	Name/ID	920209	

Test	Lots	5439EG2200 (Quaternary Active: 9.9%)	
Substance □ 1 ⊠ 2 □ 3		5439EG2400 (Quaternary Active: 9.9%)	
Preparation	Preparation	Tested concentration: LCL	
		Tested Dilution: 4 oz./ 1 gallon defined as 8.93 g +/- 0.03	
		g test substance + 291.07 g +/- 0.03 g of diluent	
		Diluent: 400 ppm AOAC Synthetic Hard Water	
Soil load		5% Heat Inactivated Fetal Bovine Serum	
Carrier type,	# per lot	100 x 15 mm sterile glass Petri dish, 1 per lot	
Test conditio	ns	Contact time: 30 seconds	
		Temperature: 15-30°C	
		Relative humidity: Not provided	
Neutralizer		Sephadex LH-20 gel column	
Reviewer comments		No Protocol Amendments or Protocol Deviations were	
(i.e. protocol deviations and		reported.	
amendments, retesting,			
control failures, etc.)		Note: Relative humidity was not reported.	

17.	MRID	51618817				
Study Object	ive	Disinfectant - Virucidal				
Testing Lab;	Lab Study ID	Ecolab; 2100009				
Experimental	Start Date	2/12/2021	Study Completion Date: 5/25/2021			
Test organism	n(s)	Herpes Simplex	Virus type 2, Strain G (ATCC VR-734)			
⊠ 1 □ 2 □ 3	□ 4+					
Indicator Cell	Culture	Vero cells (Source	ce: Quidel (Diagnostic Hybrids)			
Test Method		ASTM E1053-20	; Protocol Number: MS505 Version 5.0			
Application M	lethod	"Spray: Application 8 inches (visually	on of 4 sprays from a distance of about 6- v estimated)"			
Test	Name/ID	920209				
Substance	Lots	5439EG2200 (Do	odecylbenzenesulfonic Acid: 9.9%)			
Preparation	□1⊠2□3		odecylbenzenesulfonic Acid: 9.9%)			
	Preparation	Tested concentration: LCL Tested Dilution: 4 oz./ 1 gallon defined as 5439EG2200: 8.91 g +/- 0.03 g test substance + 291.06 +/- 0.03 g of diluent 5439EG2400: 8.90 g +/- 0.03 g test substance + 291.05 +/- 0.03 g of diluent Diluent: 400 ppm AOAC Synthetic Hard Water				
Soil load		5% Heat Inactiva	ited Fetal Bovine Serum			
Carrier type,	# per lot	Glass Petri dish,				
Test conditions		Contact time: 30 seconds Temperature: 15-30°C Relative humidity: Not provided				
Neutralizer		Sephadex LH-20	gel column			
Reviewer comments (i.e. protocol deviations and amendments, retesting,		No Protocol Amendments or Protocol Deviations were reported.				
control failures	s, etc.)	Note: Relative humidity was not reported.				

18.	MRID	51618818			
Study Object	ive	Disinfectant - Virucidal			
Testing Lab;	Lab Study ID	Ecolab; 2100014			
Experimental	Start Date	2/12/2021 Study Completion Date: 5/18/2021			
Test organism	n(s)	Human Adenovirus Type 5 (ATCC VR-5)			
☑ 1 □ 2 □ 3 □ 4+					
Indicator Cell	Culture	HeLa cells (Source: Quidel (Diagnostic Hybrids)			
Test Method		ASTM E1053-20; Protocol Number: MS505 Version 5.0			
Application M		Spray: "Application of 4 sprays from a distance of about 6-8 inches (visually estimated)"			
Test	Name/ID	920209			
Substance Preparation	Lots □ 1 □ 2 ⊠ 3	5439EG2200 (Dodecylbenzenesulfonic Acid: 9.9%) 5439EG2400 (Dodecylbenzenesulfonic Acid: 9.9%) 5439EG2600 (Dodecylbenzenesulfonic Acid: 10.0%)			
	Preparation	Tested concentration: LCL Tested Dilution: 4 oz./ 1 gallon defined as 5439EG2200: 8.91 g +/- 0.03 g test substance + 291.06 g +/- 0.03 g of diluent 5439EG2400: 8.90 g +/- 0.03 g test substance + 291.05 g +/- 0.03 g of diluent 5439EG2600: 8.93 g +/- 0.03 g test substance + 291.15 g +/- 0.03 g of diluent Diluent: 400 ppm AOAC Synthetic Hard Water			
Soil load		5% Heat Inactivated Fetal Bovine Serum			
Carrier type,	# ner lot	Glass Petri dish, 1 per lot			
Test conditio		Contact time: 30 seconds			
Tool conditio	110	Temperature: 15-30°C			
		Relative humidity: Not provided			
Neutralizer		Sephadex LH-20 gel column			
Reviewer comments (i.e. protocol deviations and amendments, retesting, control failures, etc.)		Protocol Amendments "1. 2100014-1A • The protocol was amended to change the second paragraph of the Test Substance Stability & Characterization section to state the following: The chemical quality of the test substance was verified			
		and found to be acceptable prior to use in this study under Ecolab GLP study number 1900113. • The protocol was amended to update the Health Canada reference in Test Method Requirement and Test System Justification section to "Health Canada Guidance Document – Safety and Efficacy Requirements for Surface Disinfectant Drugs (April 2020)." • The protocol was amended to update the Interpretation of Test Results section to the following: To achieve a broad-spectrum virucidal claim for Health Canada and EPA virucidal claim:			

• A minimum recoverable virus end point titer of ≥ 104.80 (4.80 log10 or 6.3 × 104 viable viral particles) per test carrier/surface is required.
• The test substance should demonstrate a ≥ 3 log10 reduction for each surface beyond the level of cytotoxicity, if present.
• The Statement of Proposed Statistical Method section is being updated to the following:
The Spearman-Kärber method will be used to calculate the TCID50 or TCD50 for the test and control results."
No Protocol Deviations were reported.
Note: Relative humidity was not reported.

19.	MRID	51618819				
Study Object	ive	Soft Surface Disinfectant - Bactericidal				
Testing Lab;	Lab Study ID	Ecolab; 2100015				
Experimental		5/24/2021 Study Completion Date: 7/1/2021				
Test organism	n(s)	Staphylococcus aureus (ATCC 6538)				
	□ 4+	Pseudomonas aeruginosa (ATCC 15442)				
Test Method		AOAC 961.02; Protocol Number: MS010 Version 5.0				
Application M	lethod	Spray application of 4 trigger pulls from a distance of about 6-8 inches (visually estimated)				
Test	Name/ID	920209				
Substance Preparation	Lots □ 1 □ 2 ⊠ 3	5439EG2200 (Dodecylbenzenesulfonic Acid: 9.9%) 5439EG2400 (Dodecylbenzenesulfonic Acid: 9.9%) 5439EG2600 (Dodecylbenzenesulfonic Acid: 10.0%)				
	Preparation	Tested concentration: LCL Tested Dilution: 6 oz./ 1 gallon defined as 5439EG2200: 22.32 g +/- 0.03 g test substance + 477.68 g +/- 0.03 g of diluent 5439EG2400: 22.32 g +/- 0.03 g test substance + 477.68g +/- 0.03 g of diluent 5439EG2600: 22.10 g +/- 0.03 g test substance + 477.90 g +/- 0.03 g of diluent Diluent: 400 ppm AOAC Synthetic Hard Water				
Soil load		5% Fetal Bovine Serum				
Carrier type, # per lot		25 mm x 25 mm fabric carriers 1" x 1" natural fabric carriers (100% cotton) and 1" x 1" synthetic fabric carriers (100% polyester), 60 carriers per lot				
Test conditions		Contact time: 10 minutes Temperature: 15-30°C Relative humidity: Not provided				
Neutralizer		Letheen Broth				
Reviewer con	nments	Protocol Amendments				

(i.e. protocol deviations and amendments, retesting, control failures, etc.)	"1. 2100015-1A – The protocol was amended to correct a typographical error in the table on page 3. For batch 5439EG2600, the batch number was incorrectly listed as "g5439EG2600". The protocol was amended to remove the "g" from the batch number."
	No Protocol Deviations were reported. Note: Relative humidity was not reported.

20.	MRID	51618820		
Study Objecti	ve	Soft Surface Disinfectant - Virucidal		
Testing Lab;	Lab Study ID	Ecolab; 2100020		
Experimental		6/16/2021 Study Completion Date: 7/1/2021		
Test organism	n(s)	Feline calicivirus	, Strain F-9 (ATCC CR-782)	
☑ 1 □ 2 □ 3	□ 4+			
Indicator Cell	Culture	CRFK (feline kidi	ney) cells (ATCC CCL-94)	
Test Method		ASTM E1053; Pr	otocol Number: MS505 Version 5.0	
Application M	lethod	Spray application	of 4 trigger pulls from a distance of	
		about 6-8 inches	(visually estimated)	
Test	Name/ID	920209		
Substance	Lots	5439EG2200 (Do	odecylbenzenesulfonic Acid: 9.9%)	
Preparation	□1 ⊠ 2 □ 3	5439EG2400 (Do	odecylbenzenesulfonic Acid: 9.9%)	
	Preparation	Tested concentra	ation: LCL	
		Tested Dilution: 6	6 oz./ 1 gallon defined as 13.39 g +/- 0.03	
			+ 286.61 g +/- 0.03 g of diluent	
			AOAC Synthetic Hard Water	
Soil load		5% Fetal Bovine Serum		
Carrier type,	# per lot	25 mm x 25 mm fabric carriers		
		1" x 1" natural fabric carriers (100% cotton) and		
		1" x 1" synthetic fabric carriers (100% polyester),		
- 4 1141		2 carriers per lot		
Test condition	ns	Contact time: 5 minutes		
		Temperature: 15		
Neutralizer		Relative humidity: Not provided Chemical neutralization with 5% FBS in EMEM with		
Neutranzer			ed by passing 5 mL through a Sephadex	
		column	ed by passing 5 mil through a Sephadex	
Reviewer con	nments	Protocol Amendr	nents	
(i.e. protocol d			he protocol was amended to change the	
amendments,			es of test substance to be tested from	
control failures		three to two with the removal of 920209 batch		
	, ,	5439EG2600 from the protocol. Note that on page 3 of the		
		protocol, the batch number was incorrectly listed as		
		g5439EG2600 in the table. Per the guidelines OCSPP		
		810.2200 for virucidal claims, only two batches are		
		needed to be tested."		
		No Protocol Devi	ations were reported.	

Note: Relative humidity was not reported.

21.	MRID	51618821				
Study Object	ive	Disinfectant - Virucidal				
Testing Lab;	Lab Study ID	Ecolab; 2100064				
Experimental	Start Date	6/15/2021 Study Completion Date: 7/1/2021				
Test organism	n(s)	Human Adenovirus Type 5 (ATCC VR-5)				
□ 1 □ 2 □ 3	□ 4+					
Indicator Cell	Culture	HeLa cells (ATCC CCL-2)				
Test Method		ASTM E1053; Protocol Number: MS505 Version 5.0				
Application N		Spray application of 4 trigger pulls from a distance of about 6-8 inches (visually estimated)				
Test	Name/ID	920209				
Substance	Lots	5439EG2200 (Dodecylbenzenesulfonic Acid: 9.9%)				
Preparation	□1⊠2□3	5439EG2400 (Dodecylbenzenesulfonic Acid: 9.9%)				
	Preparation	Tested concentration: LCL Tested Dilution: 6 oz./ 1 gallon defined as 13.39 g +/- 0.03 g test substance + 286.61 g +/- 0.03 g of diluent Diluent: 400 ppm AOAC Synthetic Hard Water				
Soil load	•	5% Fetal Bovine Serum				
Carrier type,	# per lot	25 mm x 25 mm fabric carriers 1" x 1" natural fabric carriers (100% cotton) and 1" x 1" synthetic fabric carriers (100% polyester), 1 carrier per lot				
Test conditio	ns	Contact time: 10 minutes Temperature: 15-30°C Relative humidity: Not provided				
Neutralizer		"Chemical neutralization with 5% FBS in EMEM with antibiotics followed by passing 5 mL through a Sephadex column"				
Reviewer comments		No Protocol Amendments or Protocol Deviations were				
(i.e. protocol deviations and		reported.				
amendments,	· · · · · · · · · · · · · · · · · · ·					
control failures	s, etc.)	Note: Relative humidity during test exposure was not reported.				

MRID 51618822 was not reviewed. The study is an accelerated storage stability data for the use solution after dilution with hard water. The agency does not have guidance or standards to review the study under the reported conditions to support use-solution stability.

IV. STUDY RESULTS

Disinfection – Virucidal Efficacy

MRID	Organism	Description	Results		Drie	
			Lot 5439EG2200	Lot 5439EG2400	Virus Control Log ₁₀ (TCID ₅₀ / carrier)	
				291.07 g +/- 0.03 g of me, 5% organic load p		
51618801	Bovine Viral Diarrhea Virus (BVDV) (ATCC VR-1422) as a	Replicate 10 ⁻¹ to 10 ⁻⁴ dilution Log ₁₀ TCID ₅₀ /	1 2 Complete inactivation ≤ 0.50	1 2 Complete inactivation ≤ 0.50	5.4 4	5.4 4
	surrogate for Human Hepatitis C	100 µl Log ₁₀ TCID ₅₀ / carrier	≤ 0.80	≤ 0.80		
	Virus	Log ₁₀ Reduction	≥ 4.64	≥ 4.64		
51618802	Respiratory Syncytial Virus (RSV), Strain	10 ⁻¹ to 10 ⁻⁶ dilution Log ₁₀	Complete inactivation ≤ 0.50	Complete inactivation ≤ 0.50	5.05	•
	Long (ATCC VR-26)	TCID ₅₀ /100 µl Log ₁₀ TCID ₅₀ /carrier	≤ 0.80	≤ 0.80		
		Log Reduction	≥ 4.25	≥ 4.25		
51618803	Canine Distemper	10 ⁻¹ to 10 ⁻⁷ dilution	Complete inactivation ≤ 0.50	Complete inactivation ≤ 0.50	6.80)
	Virus, Strain Lederle (ATCC VR-128)	Log ₁₀ TCID ₅₀ /100 μl Log ₁₀	≤ 0.80	≤ 0.50 ≤ 0.80		ļ
	VIC 120)	TCID ₅₀ /carrier	≥ 6.00	≥ 6.00	_	
51618804	Canine	Reduction 10 ⁻¹ to 10 ⁻²	Viral	Complete	6.05	
31010004	Parvovirus, Strain Cornell-	dilution 10 ⁻³ to 10 ⁻⁶	infectivity Complete	inactivation Complete	0.00	
	780916-80 (ATCC VR- 2017)	dilution Log ₁₀ TCID ₅₀ /100 µl	inactivation 2.50	inactivation ≤ 0.50		
	,	Log ₁₀ TCID ₅₀ /carrier	2.80	≤ 0.80		
		Log Reduction	3.25	≥ 5.25		
51618805	Human Coronavirus, Strain 229E	10 ⁻¹ to 10 ⁻⁶ dilution Log ₁₀	Complete inactivation ≤ 0.50	Complete inactivation ≤ 0.50	5.05	•
	(ATCC VR-740)	TCID ₅₀ /100 µI	_ 0.00	_ 5.55		

MRID	Organism	Description	Results	Dried		
			Lot 5439EG2200	Lot 5439EG2400	Virus Control Log₁₀ (TCID₅₀/ carrier)	
	4 oz./ 1 gallon defined as 8.93 g +/- 0.03 g test substance + 291.07 g +/- 0.03 g of AOAC Synthetic Hard Water, Spray, 30-second contact time, 5% organic load					
		Log ₁₀ TCID ₅₀ /carrier	≤ 0.80	≤ 0.80		
		Log Reduction	≥ 4.25	≥ 4.25		
51618806	Feline Panleukopenia	10 ⁻¹ dilution	Viral infectivity	Viral infectivity	4.80	
	virus, Strain Philips-Roxane	10 ⁻² dilution	Viral infectivity	Complete inactivation		
	(ATCC VR-648)	10 ⁻³ to 10 ⁻⁶ dilution	Complete inactivation	Complete inactivation	_	
		Log ₁₀ TCID ₅₀ /100 µI	1.50	0.75		
		Log ₁₀ TCID ₅₀ /carrier	1.80	1.05		
		Log Reduction	3.00	3.75		
51618807	Poliovirus type 1, Strain Chat	10 ⁻¹ to 10 ⁻⁶ dilution	Complete inactivation	Complete inactivation	5.80	
	(ATCC VR- 1562)	Log ₁₀ TCID ₅₀ /100 µI	≤ 0.50	≤ 0.50		
		Log ₁₀ TCID ₅₀ /carrier	≤ 0.80	≤ 0.80		
		Log Reduction	≥ 5.00	≥ 5.00		
51618808	Vaccinia virus, Strain WR	10 ⁻¹ to 10 ⁻⁷ dilution	Complete inactivation	Complete inactivation	6.30	
	(ATCC VR-119)	Log ₁₀ TCID ₅₀ /100 μI	≤ 0.50	≤ 0.50		
		Log ₁₀ TCID ₅₀ /carrier	≤ 0.80	≤ 0.80		
		Log Reduction	≥ 5.50	≥ 5.50		
51618809	Human Rotavirus,	10 ⁻¹ to 10 ⁻⁷ dilution	Complete inactivation	Complete inactivation	6.55	
	Strain WA (ATCC VR-	Log ₁₀ TCID ₅₀ /100 μI	≤ 0.50	≤ 0.50		
	2018)	Log ₁₀ TCID ₅₀ /carrier	≤ 0.80	≤ 0.80		
		Log Reduction	≥ 5.50	≥ 5.50		
51618810		Replicate	1 2	1 2	1 2	

MRID	Organism	Description	Results			Dried
			Lot 5439EG2200	Lot 5439EG2		Virus Control Log₁₀ (TCID₅₀/ carrier)
4 oz./ 1 gallon defined as 8.93 g +/- 0.03 g test substance + 291.07 g +/- 0.03 g of 40 AOAC Synthetic Hard Water, Spray, 30-second contact time, 5% organic load pre						
	Duck Hepatitis B virus as a	10 ⁻¹ dilution	Cytotoxicity	Cytotoxicity	Complete inactivation	5.90
	surrogate for	10 ⁻² to 10 ⁻⁴ dilution	Complete inactivation	Complete inactivation		
	Human Hepatitis B	Log ₁₀ TCID ₅₀ / 250 µl	≤ 1.50	≤ 1.24		
	virus, Source: Hepadnavirus Testing Inc.,	Log ₁₀ TCID ₅₀ / carrier	≤ 1.40	≤ 1.14		
	Palo Alto, CA	Log ₁₀ Reduction	≥ 4.50	≥ 4.76		
51618811	Human	10 ⁻¹ to 10 ⁻⁷	Complete	Complete		5.00
	Immunodeficien	dilution	inactivation	inactivation	n	
	cy Virus type 1, Strain HTLV-III _B	Log ₁₀ TCID ₅₀ /200 μI	≤ 0.50	≤ 0.50		
	obtained from Advanced	Log ₁₀ TCID ₅₀ /carrier	≤ 0.50	≤ 0.50		
	Biotechnologies , Inc. Columbia, MD	Log Reduction	≥ 4.50	≥ 4.50		
51618815	Measles virus,	10 ⁻² dilution	Cytotoxicity	Cytotoxici	ty	5.30
	strain	10 ⁻³ to 10 ⁻⁷	Complete	Complete		
	Edmonston	dilution	inactivation	inactivatio	n	
	(ATCC VR-24)	Log ₁₀ TCID ₅₀ /ml	≤ 2.50	≤ 2.50		
		Log ₁₀ TCID ₅₀ /carrier	≤ 1.80	≤ 1.80		
		Log Reduction	≥ 3.50	≥ 3.50		
		Percent Reduction	> 99.97	> 99.97		
51618816	Human Herpes	10 ⁻¹ to 10 ⁻⁵	Complete	Complete		5.05
No RH	Simplex Virus	dilution	inactivation	inactivatio	n	
	Type 1, Strain F (ATCC VR-733)	Log ₁₀ TCID ₅₀ / 0.1 ml	≤ 0.50	≤ 0.50		
		Log ₁₀ TCID ₅₀ /carrier	≤ 0.80	≤ 0.80		
		Log Reduction	≥ 4.25	≥ 4.25		
51618817	Herpes Simplex	10 ⁻¹ to 10 ⁻⁵	Complete	Complete		4.80
No RH	Virus type 2,	dilution	inactivation	inactivatio	n	
	Strain G (ATCC VR-734)	Log ₁₀ TCID ₅₀ / 0.1 ml	≤ 0.50	≤ 0.50		

MRID	Organism	Description	Results		Dried
			Lot	Lot	Virus Control Log ₁₀ (TCID ₅₀ / carrier)
			5439EG2200	5439EG2400	
4 oz./ 1 gallon defined as 8.93 g +/- 0.03 g test substa AOAC Synthetic Hard Water, Spray, 30-second con					
		Log ₁₀ TCID ₅₀ /carrier	≤ 0.80	≤ 0.80	
		Log Reduction	≥ 4.00	≥ 4.00	

Note: The filtrates were considered the 10⁻¹ dilution.

Disinfection – Virucidal Efficacy: SARS-Related Coronavirus 2, Strain Isolate USA-WA1/2020 (Source: BEI Resources NR-52281)

MRID	Organism	Description	Results	Results					
			Lot 5439EG2200	Lot 5439EG2400	Lot 5439EG2600	Virus Control (Log ₁₀ TCID ₅₀ / carrier)			
	gallon defined a Synthetic Hard Wa								
51618812	SARS- Related Coronavirus 2, Strain	10 ⁻¹ to 10 ⁻⁶ dilution Log ₁₀ TCID ₅₀ /100 µl	Complete inactivation ≤ 0.50	Complete inactivation ≤ 0.50	Complete inactivation ≤ 0.50	6.30			
	Isolate USA- WA1/2020	Log ₁₀ TCID ₅₀ /carrier	≤ 0.80	≤ 0.80	≤ 0.80				
	(Source: BEI Resources NR-52281)	Log Reduction	≥ 5.50	≥ 5.50	≥ 5.50				

Disinfection – Bactericidal Efficacy: Bordetella bronchiseptica (ATCC 10580)

MRID	Organism	Results		Population
		Lot. No.	No. Exhibiting Growth/ Total No. Tested	Control Average Log ₁₀ CFU/ carrier
	allon defined as 8.93 g +/- 0.03 Synthetic Hard Water, Spray, 3			
51618813	Bordetella bronchiseptica (ATCC 10580)	5439EG2200	0/10	5.33
	(A100 10000)	5439EG2400	0/10	
51618814	Bordetella pertussis (ATCC	5439EG2200	0/10	4.96
	12743)	5439EG2400	0/10	

^{*}Log reduction per volume inoculated per well and per carrier.

Disinfection – Virucidal Efficacy: Human Adenovirus Type 5 (ATCC VR-5)

MRID	Organism	Description	Results	Results					
			Lot 5439EG2200	Lot 5439EG2400	Lot 5439EG2600	Virus Control (Log ₁₀ TCID ₅₀ / carrier)			
4 oz./ 1	•	s 2.97 g +/- 0.03 I Water, 30-secoi	•	_	0.03 g of 400 ppr	n AOAC			
51618818	Human Adenovirus Type 5 (ATCC VR-5)	10 ⁻¹ to 10 ⁻⁵ dilution	Complete inactivation ≤ 0.50	Complete inactivation ≤ 0.50	Complete inactivation ≤ 0.50	5.25			
	VIC 0)	Log ₁₀ TCID ₅₀ /carrier	≤ 0.80	≤ 0.80	≤ 0.80				
		Log Reduction	≥ 4.75	≥ 4.75	≥ 4.75				

Soft Surface Disinfection – Bactericidal Efficacy

MRID	Organism	Fabric Type	Test Date	Results		Population	
				Lot. No.	No. Exhibiting Growth/ Total No. Tested	Control Average Log ₁₀ CFU/ carrier	
6 oz./ 1 g	gallon of 400 ppm	AOAC Synthe		er, 10-minute cor	ntact time, 5% o	organic load	
51618819	Staphylococcus		<i>present</i> 5/24/2021	5439EG2200	0/60	6.17	
	aureus (ATCC 6538)	Cotton		5439EG2400	0/60		
	,			5439EG2600	0/60		
		100%	5/26/2021	5439EG2200	0/60	6.36	
		Polyester		5439EG2400	1/60]	
				5439EG2600	0/60		
	Pseudomonas	100%	6/7/2021	5439EG2200	0/60	5.06	
	aeruginosa (ATCC 15442)	Cotton		5439EG2400	0/60		
				5439EG2600	0/60		
		100%	6/4/2021	5439EG2200	0/60	5.78	
		Polyester		5439EG2400	0/60		
				5439EG2600	1/60		

Soft Surface Disinfection – Virucidal Efficacy: Feline calicivirus, Strain F-9 (ATCC CR-782

MRID	Organism	_	Description	Resul	ts			Dried \	
6 oz./ 1 ga	allon of 400 p	Type pm AOAC S	Synthetic Hard \		G2200 i-minute		G2400 time, 5	Contro (Log ₁₀ TCID ₅₀ carrier % organi	/ ')
			prese						
51618820	Feline calicivirus,	100% Cotton	Replicate	1	2	1	2	1	2
	Strain F-9 (ATCC CR-782)	Cotton	10 ⁻² to 10 ⁻⁶ dilution	Compl inactiv		Complinactiv		5.05	4.80
				Log ₁₀ TCID ₅₀ / 100 µI	≤ 1.50		≤ 1.50		
			Log ₁₀ TCID ₅₀ / carrier	≤ 1.80		≤ 1.80			
			Log Reduction	≥ 3.13		≥ 3.13			
		100% Polyester	Replicate	1	2	1	2	1	2
		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	10 ⁻¹ to 10 ⁻⁵ dilution		Complete inactivation		Complete inactivation		5.05
			Log ₁₀ TCID ₅₀ / 100 µI	≤ 1.50		≤ 1.50			
			Log ₁₀ TCID ₅₀ / carrier	≤ 1.80		≤ 1.80			
			Log Reduction	≥ 3.25		≥ 3.25			

Soft Surface Disinfection – Virucidal Efficacy: Human Adenovirus Type 5 (ATCC VR-5)

MRID	Organism	Fabric	Description	Results		Dried Virus		
		Туре						
6 oz./ 1 ga	llon of 400 ppi	n AOAC Syl	nthetic Hard Wa	ter, 10-minute d	contact time, 5%	organic load		
			present					
51618821	Human	100%	10 ⁻² to 10 ⁻⁶	Complete	Complete	5.05		
	Adenovirus	Cotton	dilution	inactivation	inactivation			
	Type 5		Log ₁₀	≤ 1.50	≤ 1.50			
	(ATCC VR-		TCID ₅₀ / 100					
	5)		μl					
			Log ₁₀	≤ 1.80	≤ 1.80	1		
			TCID ₅₀ /					
			carrier					

MRID	Organism	Fabric	Description	Results		Dried
	Туре			Lot 5439EG2200	Lot 5439EG2400	Virus Control (Log ₁₀ TCID ₅₀ / carrier)
6 oz./ 1 ga	llon of 400 ppi	n AOAC Sy		•	contact time, 5%	organic load
	Ī	Ī	present		T	1
			Log Reduction	≥ 3.25	≥ 3.25	
		100% Polyester	10 ⁻¹ to 10 ⁻⁵ dilution	Complete inactivation	Complete inactivation	5.30
			Log ₁₀ TCID ₅₀ / 100 µI	≤ 1.50	≤ 1.50	
			Log ₁₀ TCID ₅₀ / carrier	≤ 1.80	≤ 1.80	
			Log Reduction	≥ 3.50	≥ 3.50	

V. STUDY CONCLUSIONS

MRID	Claim	Surface Type	Application Method(s) and Dilution	Contact Time	Soil load	Diluent	Organism(s)	Data support tested conditions?
51618801, 51618802, 51618803, 51618804, 51618805, 51618807, 51618809, 51618810, 51618811, 51618815, 51618818	virucidal	Hard, non-porous surface	Liquid concentrate diluted to 4 oz./ 1 gallon; applied as trigger spray	30 seconds	5%	400 ppm AOAC Synthetic Hard Water	 Bovine Viral Diarrhea Virus (BVDV) (ATCC VR-1422) as a surrogate for Human Hepatitis C Virus Respiratory Syncytial Virus (RSV), Strain Long (ATCC VR-26) Canine Distemper Virus, Strain Lederle (ATCC VR-128) Canine Parvovirus, Strain Cornell-780916-80 (ATCC VR-2017) Human Coronavirus, Strain 229E (ATCC VR-740) Feline Panleukopenia virus, Strain Philips-Roxane (ATCC VR-648) Poliovirus type 1, Strain Chat (ATCC VR-1562) Vaccinia virus, Strain WR (ATCC VR-119) Human Rotavirus, Strain WA (ATCC VR-2018) Duck Hepatitis B virus as a surrogate for Human Hepatitis B 	Yes

MRID	Claim	Surface Type	Application Method(s) and Dilution	Contact Time	Soil load	Diluent	Organism(s)	Data support tested conditions?
							virus, Source: Hepadnavirus Testing Inc., Palo Alto, CA • Human Immunodeficiency Virus type 1, Strain HTLV-III _B obtained from Advanced Biotechnologies, Inc. Columbia, MD • SARS-Related Coronavirus 2, Strain Isolate USA-WA1/2020 (Source: BEI Resources NR-52281) • Measles virus, strain Edmonston (ATCC VR-24) • Human Herpes Simplex Virus Type 1, Strain F (ATCC VR-733) • Herpes Simplex Virus type 2, Strain G (ATCC VR-734)	
							 Human Adenovirus Type 5 (ATCC VR-5) 	
51618812	Disinfectant, virucidal	Hard, non- porous surface	Liquid concentrate diluted to 4 oz./ 1 gallon; applied as trigger spray	10 seconds	5%	400 ppm AOAC Synthetic Hard Water	SARS-Related Coronavirus 2, Strain Isolate USA-WA1/2020 (Source: BEI Resources NR-52281)	Yes

MRID	Claim	Surface Type	Application Method(s) and Dilution	Contact Time	Soil load	Diluent	Organism(s)	Data support tested conditions?
51618813, 51618814	Disinfectant, bactericidal	Hard, non- porous surface	Liquid concentrate diluted to 4 oz./ 1 gallon; applied as trigger spray	3 minutes	5%	400 ppm AOAC Synthetic Hard Water	 Bordetella bronchiseptica (ATCC 10580) Bordetella pertussis (ATCC 12743) 	Yes
51618819	Disinfectant, bactericidal – soft surface	Soft surface, porous fabric, 100% cotton and 100% polyester	Liquid concentrate diluted to 6 oz./ 1 gallon; applied as trigger spray	10 minutes	5%	400 ppm AOAC Synthetic Hard Water	 Staphylococcus aureus (ATCC 6538) Pseudomonas aeruginosa (ATCC 15442) 	∛Yes
51618820	Disinfectant, virucidal – soft surface	Soft surface, porous fabric, 100% cotton and 100% polyester	Liquid concentrate diluted to 6 oz./ 1 gallon; applied as trigger spray	5 minutes	5%	400 ppm AOAC Synthetic Hard Water	• Feline calicivirus, Strain F-9 (ATCC CR-782)	≬Yes
51618821	Disinfectant, virucidal – soft surface	Soft surface, porous fabric, 100% cotton and 100% polyester	Liquid concentrate diluted to 6 oz./ 1 gallon; applied as trigger spray	10 minutes	5%	400 ppm AOAC Synthetic Hard Water	Human Adenovirus Type 5 (ATCC VR-5)	∛Yes

[§]These data to support soft surface disinfection claims were reviewed within the context of discussions between the Agency and Ecolab representatives. At the time of the submission and review of this action, the OECD method to evaluate disinfection on soft surfaces as well as relevant Agency guidance were still being developed and drafted. Per the meetings

held on May 28, 2020, October 8, 2020, and December 12, 2020, with the Agency and Ecolab regarding the soft surface disinfection claim, Ecolab agreed to perform additional testing in the future once the OECD method is finalized.

VI. LABEL COMMENTS

Label Date/Identification Number:

Multi Purpose Plus Disinfectant Cleaner (Primary – Liquid Dilutable), EPA Reg. No. 1677-272, dated 8/18/2021

Multi Purpose Plus Disinfectant Cleaner RTU (Secondary), EPA Reg. No. 1677-273, dated 7/16/2021

- 1. The proposed label claims that the product, Multi Purpose Plus Disinfectant Cleaner (Primary Liquid Dilutable), EPA Reg. No. 1677-272, when diluted at 4 oz. per gallon of 400 ppm AOAC Synthetic Hard Water for spray application, and Multi Purpose Plus Disinfectant Cleaner RTU (Secondary), EPA Reg. No. 1677-273, when applied as a ready-to-use spray is an effective disinfectant with virucidal activity against the following on hard, non-porous surfaces in the presence of 5% organic soil for a 30-second contact time:
 - Bovine Viral Diarrhea Virus (BVDV) (ATCC VR-1422) as a surrogate for Human Hepatitis C Virus
 - Respiratory Syncytial Virus (RSV), Strain Long (ATCC VR-26)
 - Canine Distemper Virus, Strain Lederle (ATCC VR-128)
 - Canine Parvovirus, Strain Cornell-780916-80 (ATCC VR-2017)
 - Human Coronavirus, Strain 229E (ATCC VR-740)
 - Feline Panleukopenia virus, Strain Philips-Roxane (ATCC VR-648)
 - Poliovirus type 1, Strain Chat (ATCC VR-1562)
 - Vaccinia virus, Strain WR (ATCC VR-119)
 - Human Rotavirus, Strain WA (ATCC VR-2018)
 - Duck Hepatitis B virus as a surrogate for Human Hepatitis B virus, Source: Hepadnavirus Testing Inc., Palo Alto, CA
 - Human Immunodeficiency Virus type 1, Strain HTLV-III_B obtained from Advanced Biotechnologies, Inc. Columbia, MD
 - Measles virus, strain Edmonston (ATCC VR-24)
 - Human Herpes Simplex Virus Type 1, Strain F (ATCC VR-733)
 - Herpes Simplex Virus type 2, Strain G (ATCC VR-734)
 - Human Adenovirus Type 5 (ATCC VR-5)

These claims are <u>acceptable</u> as they are supported by the submitted data. Study reports conducted at Ecolab Schuman Campus did not include the relative humidity during testing. In future testing, this condition should be reported in testing.

2. The proposed label claims that the product, Multi Purpose Plus Disinfectant Cleaner (Primary – Liquid Dilutable), EPA Reg. No. 1677-272, when diluted at 4 oz. per gallon of 400 ppm AOAC Synthetic Hard Water for spray application, and Multi Purpose Plus Disinfectant Cleaner RTU (Secondary), EPA Reg. No. 1677-273, when applied as a ready-to-use spray is an effective disinfectant with virucidal activity against the following on hard, non-porous surfaces in the presence of 5% organic soil for a 10-second contact time:

 SARS-Related Coronavirus 2, Strain Isolate USA-WA1/2020 (Source: BEI Resources NR-52281)

These claims are **acceptable** as they are supported by the submitted data.

- 3. The proposed label claims that the product, Multi Purpose Plus Disinfectant Cleaner (Primary Liquid Dilutable), EPA Reg. No. 1677-272, when diluted at 4 oz. per gallon of 400 ppm AOAC Synthetic Hard Water for spray application, and Multi Purpose Plus Disinfectant Cleaner RTU (Secondary), EPA Reg. No. 1677-273, when applied as a ready-to-use spray is an effective disinfectant with bactericidal activity against the following on hard, non-porous surfaces in the presence of 5% organic soil for a 3-minute contact time:
 - Bordetella bronchiseptica (ATCC 10580)
 - Bordetella pertussis (ATCC 12743)

These claims are **acceptable** as they are supported by the submitted data.

- 4. The proposed label claims that the product, Multi Purpose Plus Disinfectant Cleaner (Primary Liquid Dilutable), EPA Reg. No. 1677-272, when diluted at 6 oz. per gallon of 400 ppm AOAC Synthetic Hard Water for spray application, and Multi Purpose Plus Disinfectant Cleaner RTU (Secondary), EPA Reg. No. 1677-273, when applied as a ready-to-use spray is an effective disinfectant with bactericidal activity against the following on soft, porous surfaces in the presence of 5% organic soil for a 10-minute contact time:
 - Staphylococcus aureus (ATCC 6538)
 - Pseudomonas aeruginosa (ATCC 15442)

These claims are <u>acceptable</u> as they are supported by the submitted data. These data to support soft surface disinfection claims were reviewed within the context of discussions between the Agency and Ecolab representatives. At the time of the submission and review of this action, the OECD method to evaluate disinfection on soft surfaces as well as relevant Agency guidance were still being developed and drafted. Per the meetings held on May 28, 2020, October 8, 2020, and December 12, 2020 with the Agency and Ecolab regarding the soft surface disinfection claim, Ecolab agreed to perform additional testing in the future once the OECD method is finalized.

- 5. The proposed label claims that the product, Multi Purpose Plus Disinfectant Cleaner (Primary Liquid Dilutable), EPA Reg. No. 1677-272, when diluted at 6 oz. per gallon of 400 ppm AOAC Synthetic Hard Water for spray application, and Multi Purpose Plus Disinfectant Cleaner RTU (Secondary), EPA Reg. No. 1677-273, when applied as a ready-to-use spray is an effective disinfectant with virucidal activity against the following on hard, non-porous surfaces in the presence of 5% organic soil for a 5-minute contact time:
 - Feline calicivirus, Strain F-9 (ATCC CR-782)

These claims are <u>acceptable</u> as they are supported by the submitted data. These data to support soft surface disinfection claims were reviewed within the context of discussions between the Agency and Ecolab representatives. At the time of the submission and review of this action, the OECD method to evaluate disinfection on soft surfaces as well as relevant Agency guidance were still being developed and drafted. Per the meetings held on May 28, 2020, October 8, 2020, and December 12, 2020, with the Agency and Ecolab regarding the soft surface disinfection claim, Ecolab agreed to perform additional testing in the future once the OECD method is finalized.

- 6. The proposed label claims that the product, Multi Purpose Plus Disinfectant Cleaner (Primary Liquid Dilutable), EPA Reg. No. 1677-272, when diluted at 6 oz. per gallon of 400 ppm AOAC Synthetic Hard Water for spray application, and Multi Purpose Plus Disinfectant Cleaner RTU (Secondary), EPA Reg. No. 1677-273, when applied as a ready-to-use spray is an effective disinfectant with virucidal activity against the following on soft, porous surfaces in the presence of 5% organic soil for a 10-minute contact time:
 - Human Adenovirus Type 5 (ATCC VR-5)

These claims are <u>acceptable</u> as they are supported by the submitted data. These data to support soft surface disinfection claims were reviewed within the context of discussions between the Agency and Ecolab representatives. At the time of the submission and review of this action, the OECD method to evaluate disinfection on soft surfaces as well as relevant Agency guidance were still being developed and drafted. Per the meetings held on May 28, 2020, October 8, 2020, and December 12, 2020 with the Agency and Ecolab regarding the soft surface disinfection claim, Ecolab agreed to perform additional testing in the future once the OECD method is finalized.

- 7. Make the following changes to the proposed label. The following recommendations apply to Multi Purpose Plus Disinfectant Cleaner (Primary Liquid Dilutable), EPA Reg. No. 1677-272, dated 8/18/2021, and Multi Purpose Plus Disinfectant Cleaner RTU (Secondary), EPA Reg. No. 1677-273, dated 7/16/2021, (page numbers may vary the following page numbers are based on the label for EPA Reg. No. 1677-272):
 - a. Throughout the label,
 - i. Ensure that the brackets are removed from "hard, non-porous" surfaces.
 - ii. Ensure claims for "sanitizer/disinfectant cleaner", when referencing onestep, are qualified with "when the directions for use for sanitizer/disinfection are followed."
 - iii. Ensure that all claims for SARS-CoV-2 are specified with "on hard, non-porous surfaces" (specifically, the new SARS-CoV-2 claims). Also, remove references to USA-WA when referencing SARS-CoV-2 to be consistent with WHO recommendations that strain names should not include references to specific locations.
 - iv. Remove all references to "2019 Novel Coronavirus" to align with WHO and CDC nomenclature.
 - v. Revise "Allow surface to remain wet..." to read "Allow surfaces to remain **visibly** wet..."

vi. Especially on pages 9 and 15, specify that the exterior surfaces of appliances, refrigerators, refrigerator equipment, and similar surfaces be "allowed to come to room temperature before treatment".

b. On page 2, revise:

"For spray application, spray 6-8 inches from the surface. [Rub [wet surface] with clean brush, sponge or cloth]. Allow surface to remain wet for 3 minutes. Allow to air dry or remove solution with a wipe, mop, cloth, sponge, squeegee, or vacuum pickup. [No [water] rinse required]. [A water rinse is not required]."

To read:

"For spray application, spray 6-8 inches from the surface. Allow surface to remain **visibly** wet for 3 minutes. Allow to air dry or remove solution with a wipe, mop, cloth, sponge, squeegee, or vacuum pickup. [No [water] rinse required]. [A water rinse is not required]."

Treated surfaces should not be disturbed during the full treatment exposure time.

- c. On page 7, remove "and on porous surfaces" as data to substantiate "Human Rhinovirus 37, Strain 151-1, ATCC VR-1607" disinfection on porous surfaces were not submitted.
- d. On page 10, remove "Bacteria-fighting" and "Virus-fighting" as "fighting" may imply heightened efficacy.
- e. On page 11,
 - i. Qualify the following one-step claims referring to "combining" cleaning/deodorizing/soil removal and sanitizer/disinfectant in one product with "when the directions for use for sanitizer/disinfection are followed"
 - 1. "This [cleaner] [detergent] [disinfectant] combines cleaning and [disinfecting] [in one product]"
 - 2. "This [cleaner] [detergent] [sanitizer] combines cleaning and [sanitizing] [in one product]"
 - 3. "This product is a [cleaner] [detergent] [disinfectant] which combines cleaning, [disinfecting] and [soil removal] [deodorizing] in one product"
 - 4. "This product is a [cleaner] [detergent] [sanitizer] which combines cleaning, sanitizing, and [soil removal] [deodorizing] in one product"
 - ii. Revise "highly effective" to read "effective" as "highly" may imply heightened efficacy.
 - iii. Qualify "Cleans and disinfects [soft surfaces] [fabrics] in one [easy] step" with "when the directions for use for disinfection are followed".
 - iv. Remove "or less" from claims referencing SARS-CoV-2 at 30 seconds.
- f. On pages 11 and 12, remove "commonly touched" or specify "commonly touched hard, non-porous surfaces".
- g. On page 11,

- i. Revise "Virucidal* in 30 seconds [or less] on hard, non-porous surfaces" to read "Virucidal* in 30 seconds [or less **for SARS-CoV-2**] on hard, non-porous surfaces".
- ii. Revise "Kills [99.9% of] viruses* in 30 seconds [or less]" to read "Kills [99.9% of] viruses* in 30 seconds [or less **for SARS-CoV-2**]".

h. On page 12,

- i. Remove "revolutionary" and "revolutionizing" as these terms may imply heightened efficacy.
- ii. To align claims with current WHO and CDC nomenclature, revise "Effective against] [Kills] [pandemic]-*SARS-CoV-2 [the virus that causes COVID-19] in 10 seconds [on]-[Hard, Non-Porous]-[Non-Food Contact] [Surfaces]" to read "Effective against] [Kills] *SARS-CoV-2 [the virus that causes COVID-19] in 10 seconds [on] Hard, Non-Porous [Non-Food Contact] [Surfaces]".
- iii. Remove "2019 Novel Coronavirus" to align claims with current WHO and CDC nomenclature.
- iv. Specify each instance of SARS-CoV-2 with "on hard, non-porous surfaces".
- v. Remove "[Tested] [and] [proven effective] to help reduce the spread of [the] [SARS-CoV-2] [2019 Novel Coronavirus] [COVID-19 virus1] [in 10 seconds]". This claim is too broad and implies that the product alone can help reduce the spread of SARS-CoV-2, which is misleading. Remove "Great for spot disinfection on [soft surfaces][fabrics]" and "Great for use as a [soft surface][fabric] disinfectant."
- i. On page 13, revise "... [which could harbor hazardous microorganisms] minimizes the potential for [cross-contamination on treated surfaces] [outbreaks]"

To read:

- "... [which could harbor **pathogenic** microorganisms] minimizes [cross-contamination on treated surfaces]".
- j. On page 16, remove surface materials that may be hard, porous surfaces, such as "ceramic", "porcelain", "quartz", and "quarry tile", or qualify these surfaces with "sealed". The submitted data supports porous surfaces that closely resemble those tested fabric materials.